

1 Miles N. Clark, Esq.
Nevada Bar No. 13848
2 Matthew I. Knepper, Esq.
Nevada Bar No. 12796
3 KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
4 Las Vegas, NV 89148
Phone: (702) 856-7430
5 Fax: (702) 447-8048
6 Email: Miles.Clark@knepperclark.com

7 Michael F. Ram (*Pro Hac Vice*)
Marie N. Appel (*Pro Hac Vice*)
8 MORGAN & MORGAN COMPLEX
LITIGATION GROUP
9 711 Van Ness Avenue, Suite 500 San
Francisco, CA 94102
10 Telephone: (415) 358-6913
11 Facsimile: (415) 358-6293
Email: MRam@forthepeople.com
12 Email: MAppel@forthepeople.com

13 Benjamin R. Osborn (*Pro Hac Vice*)
14 102 Bergen Street Brooklyn, NY 11201
Telephone: (347) 645-0464
15 Email: Ben@benosbornlaw.com

16 *Counsel for Plaintiffs and the Proposed*
17 *Class*

COHEN-JOHNSON, LLC
H. Stan Johnson, Esq. (SBN: 0265)
(sjohnson@cohenjohnson.com)
375 E. Warm Springs Road, Suite 104
Las Vegas, Nevada 89119
Telephone : (702) 823-2500
Facsimile : (702) 823-3400

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Shon Morgan (*Pro Hac Vice*)
(shonmorgan@quinnemanuel.com)
John W. Baumann (*Pro Hac Vice*)
(jackbaumann@quinnemanuel.com)
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Cristina Henriquez (*Pro Hac Vice*)
(cristinahenriquez@quinnemanuel.com)
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5000

Attorneys for ANCESTRY.COM
OPERATIONS INC., ANCESTRY.COM
INC., and ANCESTRY.COM LLC

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20
21 ANTHONY SESSA and MARK SESSA, *on*
behalf of themselves and all others similarly
22 *situated,*

Plaintiffs,

23 v.

24 ANCESTRY.COM OPERATIONS INC., a
25 Virginia Corporation; ANCESTRY.COM
INC., a Delaware Corporation; and
26 ANCESTRY.COM LLC, a Delaware Limited
Liability Company,
27 Defendants.

Case No.: 2:20-cv-02292-GMN-BNW

**JOINT STIPULATION FOR ORDER
APPROVING PROPOSED CASE
DEADLINES AND [PROPOSED] ORDER**

Complaint filed: Dec. 17, 2020

Plaintiffs Mark and Anthony Sessa and defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC, by and through their counsel of record, hereby agree and stipulate as follows:

WHEREAS, on May 18, 2022, the Court approved the parties' Amended Joint Discovery Plan, (ECF No. 58);

WHEREAS, the Court ordered the parties to file a stipulation enumerating the deadlines discussed in that Amended Joint Discovery Plan, (ECF No. 62);

WHEREAS, in compliance with the Court's Order, the below table enumerates the agreed and approved deadlines discussed in the parties' Amended Joint Discovery Plan, (ECF No. 58);

WHEREAS, the below table also proposes an agreed-upon briefing schedule for plaintiff's motion to certify a class;

Event	Date of Deadline
Last Day to Serve Initial Disclosures	Completed
Last Day to Move to Amend Pleadings	July 27, 2022
Last Day to Move to Add Parties	July 27, 2022
Close of Fact Discovery	October 25, 2022 (180 days)
Last Day to Move to Certify Class	November 29, 2022
Last Day to Oppose Motion to Certify Class	January 10, 2023 (six weeks after motion)
Last Day to File Reply Supporting Motion to Certify Class	February 7, 2023
Last Day to Make Merits Expert Disclosures	30 days after decision on class certification
Last Day to Make Responsive Expert Disclosures	60 days after decision on class certification
Last Day to File Dispositive Motions	90 days after decision on class certification
Last Day to File Proposed Joint Pretrial Order	30 days after deadline to file dispositive motions, or 30 days after a decision on any filed dispositive motions, whichever is later

WHEREFORE, in compliance with the Court's Order, the parties hereby seek an Order of this Court entering the schedule enumerated above.

IT IS SO STIPULATED.

DATED this 20th day of May, 2022

KNEPPER & CLARK LLC

/s/ Miles N. Clark

Miles N. Clark, Esq., SBN 13848
miles.clark@knepperclark.com
Matthew I. Knepper, Esq., SBN 12796
matthew.knepper@knepperclark.com
Shaina R. Plaksin, Esq., SBN 13935
shaina.plaksin@knepperclark.com
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148

Counsel for Plaintiffs and the Proposed Class

COHEN-JOHNSON, LLC

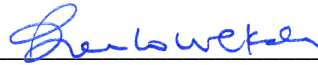
/s/ H. Stan Johnson

H. Stan Johnson, Esq. (SBN: 0265)
sjohnson@cohenjohnson.com
375 E. Warm Springs Road, Suite 104
Las Vegas, Nevada 89119

*Counsel for Defendants Ancestry.com
Operations Inc., Ancestry.com Inc., and
Ancestry.com LLC*

ORDER

IT IS SO ORDERED.



Hon. Brenda Weksler
UNITED STATES MAGISTRATE JUDGE

DATED: May 23, 2022